ENVIRON

March 21, 2003

Via e-mail

Mr. Peter Mannino
USEPA
Region II
290 Broadway, 19th Floor
New York, NY 10007-1866

Re: Remedial Alternative Screening Memorandum for the Operable Unit 2 (OU2) Feasibility Study, Cornell-Dubilier Electronics Superfund Site, South Plainfield, New Jersey

Dear Pete:

On behalf of Dana Corporation and Cornell-Dubilier Electronics, Inc., the Hamilton Industrial Park Group (HIPG), please accept the following comments on USEPA's Remedial Alternative Screening Memorandum. Although USEPA has recently rejected HIPG's prior collaborative approach, we accept USEPA's invitation to provide information relevant and useful to determining the site remedy and incorporating timely redevelopment under USEPA's Superfund Redevelopment Initiative.

When we spoke during EPA's public information session on January 30, 2003, you suggested that, in addition to containment, EPA is seriously considering non-containment remedies such as solidification/stabilization and excavation at the Site. USEPA's Screening Memorandum similarly focuses on in-situ solidification/stabilization and excavation, in addition to institutional controls and capping. HIPG is concerned that USEPA is not fully considering how non-containment remedies such as solidification and excavation could impact the surrounding community and future beneficial use of the Site.

Several characteristics specific to this Site could interfere with the feasibility, effectiveness, and safety of non-containment remedies. For example, the physical and chemical heterogeneity of on-site soils could prevent solidification from being an effective remedy at the Site. In its OU2 Remedial Investigation (RI), USEPA reports the presence of overburden materials at the Site, including man-made fill (gravel, cinders, ash, slag), debris (brick, glass fragments, wood, metal fragments, capacitors), and floodplain soils. Additionally, chemical characteristics of the soils include metals, VOCs, SVOCs, and/or PCBs. Solidification and stabilization may be impractical as a method for addressing these heterogeneous site characteristics.

Further, use of an excavation remedy could pose dangers at or near the Site. In the OU2 risk assessment, USEPA identifies Site risk characterization areas based on surficial distinctions between currently active and inactive portions of the Site, resulting in a high volume of soils considered for remediation. Given the potential volume of soils that could be identified for remediation based on this broad risk characterization, USEPA should carefully evaluate the overall risk to human health and the environment resulting from implementing an excavation or

other large-scale intrusive remedy. USEPA must consider potential health and safety risks to workers excavating and handling wastes, as well as the neighborhoods through which excavated hazardous materials may be transported.

Identifying the reasonably anticipated future use of land is another important consideration in the Superfund cleanup process and the first step for integrating reuse plans into a cleanup. While the Screening Memorandum recognizes that an important Remedial Action Objective is to "allow for the beneficial use of the property," there is little discussion of how the various potential remedial alternatives could impact reuse of the Site.

The Raymark Superfund Site located in Stratford, Connecticut, is an excellent example of USEPA decision making under similar complex circumstances. In this case, USEPA determined that the short-term risks and costs associated with excavation and treatment of the substantial volumes of contaminated soil-waste materials present at the site, or even a discrete portion of these materials, outweighed the limited increase in protectiveness afforded by these intrusive-type remedies, and therefore, treatment of wastes – even principal threat wastes – was found impracticable. USEPA's remedy decision for the Raymark Site also considered how the remedy implementation time would impact the potential reuse of the property, i.e., a containment-based remedy could be implemented faster than a more intrusive remedy, thus allowing redevelopment to proceed sooner. Additional information on the key considerations in the Raymark Site Record of Decision is attached.

Additionally, HIPG urges you to consider USEPA Region I's approach at the Norwood PCB Superfund Site in Norwood, Massachusetts. USEPA amended a 1989 ROD to select a capping remedy in place of an expensive soil treatment technology and building decontamination that USEPA had concluded after the years of litigation and delay was infeasible and cost-prohibitive. By applying a common sense approach to the Norwood site clean-up, USEPA accomplished $47.5 million in cost savings and opened the door for prompt redevelopment. USEPA's press release describing its revised approach is attached.

At this time, consistent with our prior discussions regarding USEPA's consideration of HIPG's input to the remediation and redevelopment planning for Site, we would like the opportunity to discuss the ongoing Feasibility Study for OU 2. Please call me at (609) 243-9859 so that we may discuss it further together.

Sincerely,
On behalf of the Hamilton Industrial Park Group

J. Mark Nielsen, P.E.
Manager

cc: S. Flanagan, Esq.
M. Last, Esq.
K. Stollar, Esq.
L. Wurster, Esq.

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Raymark Industries Site, Stratford, Connecticut

Key Elements of the Record of Decision

Technical Elements:

- The current use for Raymark Industries is zoned for commercial/light industrial.

- The alternative requiring excavation and on-site materials handling, off-site transportation, and incineration of the 21,000 cy of principal threat PCB wastes (> 500ppm) and other contaminants is less implementable due to the inherent technical difficulties and unknowns associated these remedial activities and would cost approximately $70M more to implement than the capping alternative.

- Since the approximately 21,000 cy to be excavated under the other alternatives only addresses 5-10% of the total contaminated soil-waste materials on the Site, it would provide only marginal increase in the long-term effectiveness over capping and NAPL removal at more than twice the cost. Therefore EPA believes that the costs for the excavation, transportation and treatment option are not proportional to its overall effectiveness and that the cost for the capping alterative is clearly proportional to its overall effectiveness when compared against the cost-effectiveness all other alternatives.

- The excavation, transportation and treatment of such large volumes would involve unacceptable short-term impacts.

- Addressing the contamination where it is currently located protects human health and the environment. The threats of inhalation, accidental ingestion or contact with skin are eliminated by isolation of contamination through capping or removal of contaminants. The net public health protection of capping all soils in place is comparable to excavating them and sending them off-site.

- The source control remedial action selected is consistent with CERCLA and NCP. The selected remedy is protective of human health and the environment, attains ARARs and is cost-effective. The selected remedy utilizes permanent solutions and alternate treatment or resource recovery technologies to the maximum extent practical. However, the selected remedy does not fully satisfy the statutory preference for treatment which permanently and significantly reduces the mobility, toxicity, or volume of hazardous substances as a principal element. This is because EPA has determined that the risks and costs attendant with treatment of a discrete portion or of the substantial volumes of contaminated soil-waste materials on-site outweigh the limited increase in protectiveness afforded and, therefore, treatment of the principal threat wastes was not found to be practicable.

Regulatory Elements:

- EPA has determined that the RCRA land disposal requirements are not triggered for the selected source control remedial action so long as the soil-waste remains within the area of contamination.

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- EPA will comply with the TCSA chemical waste landfill requirements set forth at 40 CFR .761.75 with the exception of certain requirements which are waived pursuant to 40 CFR 761.75 (c) (4).

  NOTE: Most of these exceptions are specific to Raymark due to the intent of bringing contaminated soils from off-site properties and consolidating them underneath the cap.

Implementation Elements:

- All subsurface drains on-site will be plugged to prevent containment movement.

- Impermeable cap to prevent potential human contact w/ contamination and prevent further contaminant leaching into groundwater.

- Vapor control layer as part of the cap over all soil-waste material to capture ands channel potential gas-phase VOCs to off-gas treatment system.

- Institutional controls, long-term groundwater and storm water monitoring and five year (at least) reviews will be required.

- Continuous monitoring and maintenance of the cap system to ensure integrity and prevent potential future exposure

EPA ANNOUNCES $56 MILLION IN SAVINGS AT SIX NEW ENGLAND SUPERFUND SITES
(http://www.epa.gov/NE/pr/1996/pr1009a.html)

For more information, contact:
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Larry Brill, Office of Site Remediation and Restoration, (617) 573-5721

For immediate release: October 8, 1996 Release # 96-10-10

NORWOOD, MA --- Standing in the entryway of the contaminated building slated for demolition at the Grant Gear/Norwood PCB site, senior U.S. Environmental Protection Agency (EPA) officials announced today that the agency has saved $56 million by revisiting and selecting six, less costly cleanup plans at New England Superfund Sites. Elliott Laws, EPA assistant administrator for Solid Waste and Emergency Response, and John P. DeVillars, regional administrator for EPA New England, joined local and state representatives in Norwood to describe the $47.5 million savings achieved at the Norwood site and the efforts underway to encourage redevelopment of this contaminated property.

"The savings we accomplished here at Norwood represents one of the best national examples of faster, less costly remedies. By working closely with the local community and responsible companies, and maintaining our commitment to protecting public health and the environment, we achieved a sensible solution that we hope will lead to beneficial economic redevelopment for the town of Norwood and its citizens," said Elliott Laws.

"EPA New England promised that we would apply common sense in our cleanup remedies and we have delivered just that today. This region is at the forefront nationally when it comes to updating remedies and saving taxpayer dollars - $56 million at Norwood and five other New England sites," stated John P. DeVillars. "Norwood and New England taxpayers also gain by having the prior owners and companies deemed responsible for this contamination step forward to help pay for the cleanup and promote urban revitalization of this property."

EPA revised the original soil remedy at Norwood based on new cost and design data. Norwood was initially targeted for cleanup using solvent extraction, an innovative technology. After careful review and cost considerations, EPA decided that, despite the agency's increasing support for the use of innovative alternative technologies, the expected cost merited a review of alternatives that would be as protective and would allow for commercial reuse of the site. EPA worked closely with the Massachusetts Department of Environmental Protection, responsible companies and the local community in determining this final cleanup. The final remedy selected are soil consolidation and capping at a cost of approximately $7 - $10 million.

Construction of a protective cap over the site and cleanup of Meadow Brook will be performed by responsible parties with their own funds. This will keep valuable EPA trust fund resources available to pursue cleanup work at other sites.

Demolition of the Grant Gear building at 921 Providence Highway started today is expected to be completed before the end of December. Initial work will focus on removal of asbestos from the building and cleanup of the interior of the building.

In addition, the U.S. Department of Justice and the State of Massachusetts recently reached two agreements with a value of more than $15 million with three companies to help clean up the PCB-laden Norwood site. In one of the settlements, two companies -- Federal Pacific Electric Company and Cornell Dubilier Electronics, Inc. -- agreed to undertake work with a value of about $10 million to help clean up the site. In the other agreement, Cooper Industries, Inc., agreed to pay the United States more than $5 million for past and future costs.

In addition to the cost savings at the Norwood site, EPA also announced remedy changes at these Superfund sites in New England:

Davis Liquid in Smithfield, RI: EPA and the Rhode Island Department of Environmental Management revised the original plan to destroy approximately 25,000 cubic yards of soil using high temperature incineration. The revised plan, which will save $4 to $5 million, will use a new technology, low temperature thermal desorption, to clean the site. This change still provides environmental and public health protections with the additional benefit of major cost savings for responsible companies from whom EPA is seeking cost recovery.

Coakley Landfill in North Hampton, NH: Based on new data indicating reduced landfill gas volumes, EPA allowed passive gas venting instead of flaring of gases which saves an estimated $650,000.

PSC Resources in Palmer, Mass.: Revised part of the original remedy from in-situ stabilization to ex-situ stabilization to consolidate wastes and change to an impermeable cap, a savings of an estimated $1 million.

Pinette's Salvage Yard in Washburn, Maine: Revised long term groundwater remedy in response to new monitoring data, saving an estimated $2 million in reduced cleanup costs. New data revealed the original source control remedy was more effective than anticipated, thus allowing natural attenuation to replace pump and treat technology.

Gilson Road in Nashua, NH: Turned off first groundwater pump-and-treat system in New England after achieving cleanup goals in the groundwater. Treatment cost savings estimated at $3.6 million. Groundwater will continue to be monitored.

EPA New England is continuing review of all remedy decisions to identify sites where new information indicates revisions may be appropriate.

METADATA

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